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Submitting Organization
RHONE-POULENC INC

Contractor
STAUFFER CHEMICAL CO

Document Title
INITIAL SUBMISSION: TOXICOLOGY LAB REPORT ON FLUOSILICIC ACID WITH COVER LETTER DATED 10/27/92

Chemical Category
FLUOSILICIC ACID

8(e)

CAP

(COMPLIANCE AUDIT PROGRAM)

11812

TSCA CONFIDENTIAL BUSINESS INFORMATION

ORIGINAL - TDAS (BLAKE)

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8EHQ-1192-11812

Contains No CBI

RHÔNE-POULENC

92 NOV -2 AM 9:58

RHÔNE-POULENC INC.
CN 7500, CRANBURY, NJ 08512-7500
TELEPHONE: (609) 395-8300

October 27, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 416 555 462

Document Processing Center (TS-790)
Attn: Section 8(e) Coordinator (CAP Agreement)
Office of Toxic Substances
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID NO.: 8ECAP - 0004

RP CAP REPORT NO.: RPS - 0400

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN5266, Princeton, NJ 08543-5266) and its subsidiaries, the attached report is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA (8ECAP - 0004).

The enclosed report provides information on the following chemical substance:

Chemical Identity:	Fluosilicic acid
CAS Registry No.:	16961-83-4
CAS Registry Name:	Hydrogen hexafluorosilicate

0 0 0 3

The title of the enclosed report is:

Toxicology Lab Report T-1731

The following is a summary of the adverse effects observed in this report.

The oral LD50 was 430 mg/kg and thus, the compound would be classified as moderately toxic based on EPA's criteria under Section 8(e). Fluosilicic acid was also found to be corrosive to the skin and eyes of rabbits. In the skin irritation test, severe erythema and edema were observed. No evidence of reversibility was seen in either the skin or eye irritation studies. The exact pH of this chemical is not known, but the Merck Index indicates that the chemical is a fairly strong acid. The irritation results for phosphoric acid are not considered to meet the reporting criteria of Section 8(e) as this chemical has a pH of less than 1.0.

RPI does not claim any portion of the information in this submission to be TSCA confidential business information (TSCA CBI).

RPI has not previously submitted any TSCA Section 8(e) notices or premanufacture notification on the subject chemical substance.

In total, RPI is submitting three copies of the enclosed report and this cover letter: an original and two copies.

Further questions regarding this submission may be directed to Dr. Glenn S. Simon, Director of Toxicology at (919)549-2222 (Rhône-Poulenc, P.O. Box 12014, 2 T.W. Alexander Drive, Research Triangle Park, NC 27709).

Sincerely,

Charles E. Moyer, Jr., Ph.D.
Director, Product Safety
(609)860-3589

CEMjr/mm
Enclosures

BEGIN REPORT

T-1731

CONFIDENTIAL

TOXICOLOGY REQUEST FORM

T-No. 1731

Project No. 70-0410

Compound (1) WET PHOSPHORIC Acid
(2) FLUOSILICIC Acid. (SG=1.2)

Date 6-2-71

Identification (lot, batch, etc.) K P N 0-70-0

Use (insect., herbicide, etc.) VARIOUS

STRUCTURE

Purity (%) 70
by (IR, m.p.,etc)
Known Impurities

Complete for formulations:

Per cent technical
solvent
per cent

Check and Complete:

- ☐ Acute oral toxicity - species
- ☐ Acute dermal toxicity - rabbits
- ☒ Primary skin irritation (Industrials) - rabbits
- ☐ Acute eye irritation - rabbits
- ☐ Other (specify)

Report Distribution NORMAL + SALT LAKE PLANT PERSONNEL.

Remarks

265-19-220-10-69-5M

Requested By SALT LAKE CITY, PLANT

CONFIDENTIAL

STAUFFER CHEMICAL COMPANY

WESTERN RESEARCH CENTER

COMPANY CONFIDENTIAL

TOXICOLOGY LAB REPORT T-1731 July 21, 1971

FLUOSILICIC ACID AND WET PHOSPHORIC ACID 0-70-0

I. OBJECTIVE

1. To evaluate the acute oral toxicity and the skin and eye irritation properties of FLUOSILICIC ACID.

2. To evaluate the skin and eye irritation properties of wet phosphoric acid.

II. MATERIALS

1. FLUOSILICIC ACID. 23% approx. received from the 1415 South 47th Street, Richmond Plant on April 22, 1971.

2. Wet PHOSPHORIC ACID 0-70-0. Received from the Salt Lake City Plant May 12, 1971.

III. SUMMARY

	FLUOSILICIC	PHOSPHORIC
1. Skin irritation index and classification	8.0* corrosive	8.0** corrosive
2. Eye irritation classification	corrosive	corrosive
3. Acute oral LD_{50}, female rats, mg/kg	430(295-626)	-

*A modified Draize dermal of one hour exposure indicated the material is primary irritant.

**Because of perforations of the abdominal walls of all test rabbits, observations were made 24 hours after treatment. A one hour exposure also indicated the material was corrosive.

IV. PROCEDURES

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A. Skin Irritation Index, Draize Dermal

The Draize Dermal procedure was followed as outlined in the Code of Federal Regulations (Part 191.11, Chap. 1, Title 21) for evalutaing hazardous substances. The test procedure is designed to determine whether a chemical is a primary skin irritant, ie., capable of initiating an extreme tissue reaction or skin inflammation to an insult or injury. The inflammatory process may vary from a barely perceptible hyperemia, to edema formation and vesiculation, and finally to an intense suppurative process. Irritation itself is not directly measured, but the result or consequence of irritation, that is, the injury reaction following irritation.

The Draize Dermal test is further discussed in Appendix A.

B. Acute Eye Irritation

The procedure employed is in accordance with the test for eye irritants outlined in the Code of Federal Regulations (Part 191.12, Chap. 1, Title 21) for evaluating hazardous substances.

Six New Zealand rabbits in the 1.6-2.1 kg weight range were used as the test animals. Ten mg or 0.1 ml of the test material was placed in one eye of each animal by gently pulling the lower lid away from the eyeball to form a cup into which the test material is dropped. The lids were gently held together for one second and the animal released. The other eye, remaining untreated, served as the control. The eyes were observed at 24, 48 and 72 hours following treatment and scored for irritation properties.

Eye irritation was determined according to the method outlined in the "Illustrated Guide for Grading Eye Irritation by Hazardous Substances." A total score of 110 is possible. A non-irritant must have a score of 10 or less. If, at the end of 72 hours ocular damage appears to be remissible (reversible), the animal is observed for an additional 4-7 days before final scoring is possible.

C. Acute Rat Oral

Sprague Dawley albino white rats in the 200 gram weight range were used in the study. The material was administered in water in single doses to fasted rats by means of a stomach tube. Five animals were used for each dose level. Test animals were fasted for 24 hours prior to treatment. The animals were observed 14 days for mortalities and signs of toxicity. The mortalities and survivors of the highest test level were autopsied for gross pathological observation after the 14 day period.

CONFIDENTIAL

V. RESULTS

A. Skin Irritation, Draize Dermals

See charts on page 4.

B. Eye Irritation, Rabbits

1. FLUOSILICIC ACID -- produced severe and permanent corneal opacity with scar tissue.

2. WET PHOSPHORIC ACID -- produced total destruction of the entire eye structure and all surrounding tissues.

C. Acute Oral, Female Rats

FLUOSILICIC ACID

1. Mortality:

Dose Level, mg/kg			
215	464	1,000	2,150
0/5	3/5	5/5	5/5

2. Signs of Toxicity:

No apparent signs of toxicity were observed at the 215 mg/kg dose level. Higher dose levels produced acute depression.

3. Gross Pathology

The animals of the 215 mg/kg dose level appeared grossly normal when necropsied 14 days after treatment. Mortalities exhibited massive areas of hemorrhage of the entire gastrointestinal tract.

Work done by: A. Hall
J. Saylor
C. Bullock

Submitted by C. H. Bullock
C. H. Bullock

Approved by F. X. Kamienski
F. X. Kamienski

FXK:ea

1. FLUOSILICIC ACID — RABBIT NO.

Expos. Time Hrs.	ERYTHEMA	4M Score	5M Score	6M Score	20F Score	23F Score	24F Score	Means
24	Intact	4	4	4	4	4	4	4
72	Intact	4	4	4	4	4	4	4
24	Abraded	4	4	4	4	4	4	4
72	Abraded	4	4	4	4	4	4	4
							SUBTOTAL	16
	EDEMA							
24	Intact	4	4	4	4	4	4	4
72	Intact	4	4	4	4	4	4	4
24	Abraded	4	4	4	4	4	4	4
72	Abraded	4	4	4	4	4	4	4
							SUBTOTAL	16
							TOTAL SCORE	32
							(TOTAL /4) PRIM. IRIT. INDEX	8
CORROSIVE								

2. PHOSPHORIC ACID — RABBIT NO.

Expos. Time Hrs.	ERYTHEMA	17M Score	18M Score	3M Score	35F Score	36F Score	19F Score	Means
24	Intact	4	4	4	4	4	4	4
72	Intact	IRREVERSIBLE DAMAGE						4
24	Abraded	4	4	4	4	4	4	4
72	Abraded	----------	----------	----------	----------	----------	----------	4
							SUBTOTAL	16
	EDEMA							
24	Intact	4	4	4	4	4	4	4
72	Intact	----------	----------	----------	----------	----------	----------	4
24	Abraded	4	4	4	4	4	4	4
72	Abraded	----------	----------	----------	----------	----------	----------	4
							SUBTOTAL	16
							TOTAL SCORE	32
							(TOTAL /4) PRIM. IRIT. INDEX	8
CORROSIVE								

APPENDIX A

DESCRIPTION OF THE DRAIZE DERMAL SKIN IRRITATION TEST

The Draize dermal method of testing primary irritant substances is described in the Code of Federal Regulations under the Federal Hazardous Substances Labeling Act, Part 191.11, Chapter 1, Title 21 as follows:

Primary irritation to the skin is measured by a patch-test technique on the abraded and intact skin of the albino rabbit, clipped free of hair. A minimum of six subjects are used in abraded and intact skin tests. Introduce under a square patch such as surgical gauze measuring 1 inch x 1 inch, two single layers thick, 0.5 milliliter (in case of liquids) or 0.5 gram (in the case of solids and semisolids) of the test substance. Dissolve solids in an appropriate solvent and apply the solution as for liquids. The animals are immobilized with patches secured in place by adhesive tape. The entire trunk of the animal is then wrapped with an impervious material such as rubberized cloth for the 24-hour period of exposure. This material aids in maintaining the test patches in position and retards the evaporation of volatile substances. After 24 hours of exposure, the patches are removed and the resulting reactions are evaluated on the basis of the designated values in the following table:

Evaluation of skin reactions	*Value*[1]
Erythema and eschar formation:	
No erythema	0
Very slight erythema (barely perceptible)	1
Well-defined erythema	2
Moderate to severe erythema	3
Severe erythema (beet redness) to slight eschar formation (injuries in depth)	4
Edema formation:	
No edema	0
Very slight edema (barely perceptible)	1
Slight edema (edges of area well defined by definite raising)	2
Moderate edema (raised approximately 1 millimeter)	3
Severe edema (raised more than 1 millimeter and extending beyond the area of exposure)	4

[1] The "value" recorded for each reading is the average value of the six or more animals subject to the test.

Readings are again made at the end of a total of 72 hours (48 hours after the first reading). An equal number of exposures are made on areas of skin that have been previously abraded. The abrasions are minor incisions through the stratum corneum, but not sufficiently deep to disturb the derma or to produce bleeding. Evaluate the reactions of the abraded skin at 24 hours and 72 hours, as described in this paragraph. Add the values for erythema and Eschar formation at 24 hours and at 72 hours for intact skin to the values on abraded skin at 24 hours and at 72 hours (four values). Similarly, add the values for edema formation at 24 hours and at 72 hours for intact and abraded skin (four values). The total of the eight values is divided by four to give the primary irritation score. Example:

	Exposure time	Exposure unit
Erythema and eschar formation:	*Hours*	*Value*
Intact skin	24	2
Do	72	1
Abraded skin	24	3
Do	72	2
Subtotal		8
Edema formation:		
Intact skin	24	0
Do	72	1
Abraded skin	24	1
Do	72	2
Subtotal		4
Total		12

Primary irritation score is 12÷4=3.

Compounds producing combined averages (primary irritation indexes) of 2 or less are only mildly irritating; whereas those with indexes from 2 to 5 are moderate irritants, and those with scores above 5 are considered severe or primary irritants.

MODIFIED

CONFIDENTIAL

DERMAL TOXICITY RABBIT

Operator JS, AH, CB Starting Date 6-15-76 T No. T-1731-1

Compound Wet Phosphoric [redacted] Acid - 70%

Concentration AS RECEIVED (NEAT) Dosage 0.5 cc OR .5 PER PATCH

Solvent LIQUIDS NEAT / SOLIDS MOISTENED WITH H_2O PH —

Experimental Design 121.11 MODIFIED FOR 1 HOUR EXPOSURES, PERFORMED ON SAME ANIMAL AS 24 HOUR EXPOSURE

Rab. No.	Body Wt. Kg.	Time Dosed	Expos. Time Hrs.		RABBIT NO. 17 Score	18 Score	3 Score	35 Score	36 Score	19 Score	Means
17	2100	10 50 A	[redacted] 1/25	Intact	0/4	0/4	4/4	4/4	4/4	4/4	4
18	1800	10 55 A	73	Intact			CORROSIVE				
3	1900	10 55 A	[redacted] 1/25	Abraded	4/4	4/4	4/4	4/4	4/4	4/4	4
35	2300	10 55 A	73	Abraded							
36	2500	11 02 A									SUBTOTAL
19	1900	11 05 A	[redacted] 1/25	EDEMA Intact	1/4	0/4	1/4	2/4	1/4	1/4	1
	Term Wt. Kg.		73	Intact							
			[redacted] 1/25	Abraded	2/4	3/4	3/4	3/4	3/4	3/4	3
			73	Abraded							
											SUBTOTAL
											TOTAL SCORE
											(TOTAL /6) PRIM. IRIT. INDEX

THIS TEST IS DESIGNED TO DETERMINE SHORT EXPOSURE CORROSIVE QUALITY S. DOES NOT NECESSARILY CORRELATE WITH DRAIZE INDEX. (Abdominal cavities of all animals were perforated after 24-hour exposure. Animals were sacrificed after 24 hours)

CONFIDENTIAL

DERMAL TOXICITY Rabbit

Operator F.R.A.C.B. Starting Date 6-15-71 T No. T-1731-1

Compound Wet Phosphoric Acid

Concentration As Acid Dosage 0.5 ml

Solvent None PH

Experimental Design 0.5 ml applied to intact & abraded side for 24 hrs exposure c rubber cover.

Rab. No.	Body Wt. Kg.	Time Dosed	Expos. Time Hrs.	ERYTHEMA	17 Score	18 Score	3 Score	35 Score	36 Score	19 Score	Means
17♂	2100	2^04	24	Intact							
18♂	1800	2^02	72	Intact							
3♂	1900	2^10	24	Abraded							
35♀	2300	2^13	72	Abraded							
36♀	2500	2^16							SUBTOTAL		
19♀	1900	2^21		EDEMA							
	Term		24	Intact							
	Wt. Kg.		72	Intact							
			24	Abraded							
			72	Abraded							
									SUBTOTAL		
									TOTAL SCORE		
						(TOTAL /4) PRIM. IRIT. INDEX					

All animals were sacrificed after 24 hours due to severe corrosive properties of Wet Phosphoric Acid

T-1731-2

Stauffer Chemical Company
Western Research Center
Toxicology Section

4300 (295-626)

ACUTE ORAL SHEET 2

CONFIDENTIAL

Date 6-17-71

Material Fluosilicic Acid Batch # _____

Dose 215 mg/Kg

Concentration 200 mg/ml - 20% (H2O

Factor 1.08

Rat No.	Body Weight (g)	Total Dose (ml)	Ti
1	238	0.26	
2	176	0.19	
3	186	0.20	
4	198	0.20	
5	196	0.21	

Observations:

6-17 3rd p 0/5 dead. Normal

6-30 " " Sac & Normal

1.07

215.

15.00

T-1731-2

Stauffer Chemical Compar
Western Research Center
Toxicology Section

ACUTE ORAL SHEET ♀

Date 6-16-71

CONFIDENTIAL

Material Fluosilicic Acid Batch # _____

Dose 464 mg/Kg

Concentration 200 mg/ml - 20 % (H2O

Factor 2.32

Rat No.	Body Weight (g)	Total Dose (ml)	Ti
1	200	0.46	2[illegible]
2	210	0.49	
3	200	0.46	
4	160	0.37	
5	174	0.40	23[illegible]

Observations:

6-16 3[illegible]p 0/5 dead. Moderate depression. One (1) critical
4[illegible]p 1/5 dead - Autopsy shows massive hemorrhage G.I. Tr.
6-17 8[illegible]a 3/5 dead - Normal
6-30 " " , Sac - Normal

0015

T-1731-2

Stauffer Chemical Company
Western Research Center
Toxicology Section

ACUTE ORAL SHEET ♀ CONFIDENTIAL

Date 6-17-71

Material Fluosilicic Acid Patch #

Dose 1000 mg/kg

Concentration 200 mg/ml - 20 % (H_2O

Factor 5

Rat No.	Body Weight (g)	Total Dose (ml)	Ti
1	226	1.1	9[illegible]
2	224	1.1	
3	220	1.1	
4	206	1.0	
5	226	1.1	9[illegible]

Observations:

6-17 9 40 A 0/5 dead. All very depressed except one.
10 00 A 1/5 " " " " " " "
11 00 A 4/5 " Remaining slightly depressed.
2 00 P 4/5 " " moderately "
3 00 P 5/5 dead

MODIFIED

CONFIDENTIAL

DERMAL TOXICITY RABBIT

Operator JS, AH, CB Starting Date 6-15-71 T No. T-1731-2

Compound Fluorosilicic Acid

Concentration AS RECEIVED (NEAT) Dosage 0.5 cc OR .5 PER PATCH

Solvent LIQUIDS NEAT / SOLIDS MOISTENED WITH H_2O PH ---

Experimental Design 121.11 MODIFIED FOR 1 HOUR EXPOSURES, PERFORMED ON SAME ANIMAL AS 24 HOUR EXPOSUR

RABBIT NO.

Rab. No.	Body Wt. Kg.	Time Dosed	Expos. Time Hrs.		4 Score	5 Score	6 Score	20 Score	23 Score	24 Score	Means
4	1800	1330 P	1/25	Intact	4/4	4/4	0/0	0/0	4/4	4/4	2.33/2.33
5	2000	1335 P	73	Intact	4	4	0	0	4	4	2.33
6	1900	1340 P	1/25	Abraded	4/4	4/4	4/4	4/4	4/4	4/4	4/4
20	2000	1400 P	73	Abraded	4	4	4	4	4	4	4
23	2300	1423 P								SUBTOTAL	19
24	2400	1447 P		EDEMA							
	Term		1/25	Intact	3/3	2/3	0/0	0/0	2/3	2/3	1.33/2.33
	Wt. Kg.		73	Intact	2	2	0	0	2	3	1.66
			1/25	Abraded	2/3	2/3	2/2	2/1	2/3	2/2	2/2.33
			73	Abraded	3	3	2	1	3	2	2.33
										SUBTOTAL	12
										TOTAL SCORE	31
										(TOTAL /6) PRIM. IRIT. INDEX	5.16

THIS TEST IS DESIGNED TO DETERMINE SHORT EXPOSURE CORROSIVE QUALITYS. DOES NOT NECESSARILY CORRELATE WITH DRAIZE INDEX.

CONFIDENTIAL

DERMAL TOXICITY Rabbit

Operator J.R.A., C.B. Starting Date 6-15-71 T No. T-1731-2

Compound Fluosilicic Acid

Concentration As received Dosage 0.5 ml

Solvent None PH

Experimental Design 0.5 ml applied to intact & abraded skin for 24 hours exposure & rubber cover.

Rab. No.	Body Wt. Kg.	Time Dosed	Expos. Time Hrs.		RABBIT NO. 4 Score	5 Score	6 Score	20 Score	23 Score	24 Score	Means
4♂	1800	2:48	24	ERYTHEMA Intact	4	4	4	4	4	4	4
5♂	2000	2:57	72	Intact	4	4	4	4	4	4	4
6♂	1900	2:58	24	Abraded	4	4	4	4	4	4	4
20♀	2000	3:00	72	Abraded	4	4	4	4	4	4	4
23♀	2300	3:02								SUBTOTAL	16
24♀	2400	3:10		EDEMA							
	Term		24	Intact	4	4	4	4	4	4	4
	Wt. Kg.		72	Intact	4	4	4	4	4	4	4
			24	Abraded	4	4	4	4	4	4	4
			72	Abraded	4	4	4	4	4	4	4
										SUBTOTAL	16
										TOTAL SCORE	32
										(TOTAL /4) PRIM. IRIT. INDEX	8
										Corrosive	

CONFIDENTIAL

EYE TOXICITY Rabbit T No. T-1751-1

Operator [illegible] Starting Date 6-5-71 Rabbit No. _____

Compound Wet Phosphoric Acid

Concentration As rec'd Dosage 0.1 ml

Solvent None PH _____

Experimental Design 0.1 ml instilled in left eye

	Date	Body Wt. Kg	Time Dosed	Time Obs. Hr.	Cornea Opac	Cornea Area	Cornea Score	Iris Irit.	Iris Score	Conjunctivae Ery.	Conjunctivae Ed.	Conjunctivae Dis.	Conjunctivae Sc.	Tot. Score
27	6/15	2100	2[04]											
	6/16			24	Obscured			corrosion						110
28	6/15	1800	2[07]											
33	6/15	1900	2[10]											

CONFIDENTIAL

EYE TOXICITY CONFIDENTIAL 731-1

Operator _____ Starting Date _____ Rabbit No. _____

Compound _____

Concentration _____ Dosage _____

Solvent _____ PH _____

Experimental Design _____

	Date	Body Wt. Kg	Time Dosed	Time Obs. Hr.	Cornea Opac	Cornea Area	Cornea Score	Iris Irit	Iris Score	Conjunctivae Ery.	Conjunctivae Ed.	Conjunctivae Dis.	Conjunctivae Sc.	Tot. Score
9/15	6/15	2300	2 13 P											
9/2	6/15	2500	2 15											
9/9	6/15	1900	2 21											

CONFIDENTIAL

EYE TOXICITY Rabbit T No. T-1731-2

Operatc K. Gd. CB Starting Date 6-15-71 Rabbit No.

Compound Fluosilicic Acid

Concentration As rec'd Dosage 0.1 ml

Solvent Water PH

Experimental Design 0.1 ml instilled in left eye.

Date	Body Wt. Kg	Time Dosed	Time Obs. Hr.	Cornea Opac	Cornea Area	Cornea Score	Iris Irit	Iris Score	Conjunctivae Ery	Conjunctivae Ed.	Conjunctivae Dis.	Conjunctivae Sc.	Tot. Score
1.													
6/15	1.600	248											
6/16			248	2	4	40	1	5	3	3	3	18	63
6/17			4 cc D	2	4	40	1	5	3	3	3	18	63
6/18			2 cc P	2	4	40	1	5	3	3	3	15	63
6/22			1 cc P	3	4	60	-	-	3	3	1	14	74
2.													
6/15	2000	252											
6/16			252 D	Obscured @ corrosion									20+
6/17			4 cc D		"			"			—		20+
6/18			2 cc P		4			"		—			20+
6-20			1 cc P	4	4	80	-	-	3	3	3	18	98
3.													
6/15	1900	300											
6/16			3 cc P	Obscured @ corrosion									20+
6/17			4 cc D		"			"			—		20+
6-18			2 cc P		"			"			—		20+
6-20			1 cc P		"			"			—		20+

CONFIDENTIAL

EYE TOXICITY _____ T No. T-1731-2

Operator _____ Starting Date _____ Rabbit No. _____

Compound _____

Concentration _____ Dosage _____

Solvent _____ PH _____

Experimental Design _____

	Date	Body Wt. Kg	Time Dosed	Time Obs. Hr.	Cornea Opac	Cornea Area	Cornea Score	Iris Irit	Iris Score	Conjunctivae Ery	Conjunctivae Ed.	Conjunctivae Dis	Conjunctivae Sc.	Tot. Score
	6/15	2.00	3PD											
	6/16			3D P	Obscured & corrosion									20+
9	6/17			4D P		11			11	—				20+
0	6/18			2D P		11			11	—		—		20+
	6-20			1D P		11			11	—		—		20+
	6/15	3.00	3PD											
	6/16			3D P	Obscured & corrosion									20+
9	6/17			4D P	1	4	20	2	10	3	3	2	16	46
23	6-18			2D P	Obscured & corrosion							—		20+
	6-20			1D P	4	4	80	—	—	3	3	2	16	96
	6/15	2.00	3PD											
	6/16			3D P	Obscured & corrosion									20+
9	6/17			4D P		11			11	—				20+
24	6-18			2D P		11			11	—		—		20+
	6-20			1D P		4			1+	—		—		20+

CERTIFICATE OF AUTHENTICITY

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